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August 17, 2021

**Via ECF**

Honorable Ona T. Wang  
United States Magistrate Judge  
U.S. District Court Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *BSG Resources Guinea Limited et al. (BSGR) v. George Soros et al.*, No. 1:17-cv-02726 (JFK) (OTW)

Dear Judge Wang:

As co-counsel for Plaintiffs, we write respectfully to object procedurally to Defendants' self-styled "letter-motion" from this morning (ECF 274). Pursuant to Your Honor's Individual Practices, prior to filing a discovery letter-motion, a party must "first confer in good faith with the opposing party, in person or by telephone, in an effort to resolve the dispute" (Rule II.b). The letter-motion must also include "a representation that the meet-and-confer process occurred" (*id.*). Defendants did not meet and confer with Plaintiffs prior to submitting the letter-motion, and, accordingly, there is no representation that they did so in the letter-motion. Moreover, in Plaintiffs' letter yesterday about the depositions (ECF 273), we copied by name separate counsel for Mr. Steinmetz and Mr. Cramer, given their representations to us yesterday. As far as we can tell, Defendants made no effort to serve the letter-motion on independent counsel for Mr. Steinmetz and Mr. Cramer despite the fact that the letter-motion might impact their clients' interests.

Should Your Honor nonetheless permit Defendants' letter-motion to proceed, Your Honor's Individual Practices provide for three business days for a response (Rule II.b). Plaintiffs will file a substantive response earlier, by Thursday of this week. Plaintiffs note that, to the extent some of the issues raised in the letter-motion were raised in Defendants' May 2021 motion to compel the depositions (ECF 238), Plaintiffs substantively responded to those issues and allegations at that time (ECF 244). If the letter-motion proceeds, Plaintiffs would like an opportunity to respond to the specific points raised in the letter-motion, including both the characterizations of the arguments from the previous motion and the new assertions and claims.

Respectfully,

A handwritten signature in blue ink, appearing to read "Louis M. Solomon".

Louis M. Solomon

cc: Counsel of Record (via ECF), Daniel Kinzer (via email), David Barnett (via email), Craig Pollack (via email).